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11 *Attorneys for Defendant Synchrony Bank identified herein as
12 Care Credit, LLC and Synchrony Financing, Inc.*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 LERNER & ROE INJURY ATTORNEYS, a
16 Nevada Corporation,

17 CASE NO. 2:20-cv-00465-APG-EJY

18 Plaintiffs,

19 v.

20 ARQUIDEMES COSME; UNITED STATES OF
21 AMERICA DEPARTMENT OF TREASURY,
22 INTERNAL REVENUE SERVICE; UNITED
23 STATES OF AMERICA DEPARTMENT OF
24 VETERANS AFFAIRS, VETERANS HEALTH
25 ADMINISTRATION; CARE CREDIT LLC;
26 SYNCHRONY LENDING, INC.; RAUSCH
27 STURM, ISRAEL, ENERSON & HORNICK
28 LLP; DOES I-V; and ROE CORPORATIONS I-
V,

Defendants.

**JOINT MOTION AND ORDER TO
EXTEND TIME FOR DEFENDANTS
CARE CREDIT LLC AND SYNCHRONY
LENDING, INC TO FILE AND SERVE A
RESPONSE TO PLAINTIFF'S
COMPLAINT**

[FIRST REQUEST]

21 Plaintiff Lerner & Rowe Injury Attorneys ("Plaintiff") and Defendants CareCredit LLC and
22 Synchrony Lending, Inc. ("Synchrony Defendants"), (together, the "Parties") hereby jointly move
23 for an extension, by and through their attorneys of record, as set forth below:

24 WHEREAS, Plaintiff filed a Complaint on March 5, 2020;

25 WHEREAS, Synchrony Defendants received the Complaint on March 11, 2020;

26 WHEREAS, this extension is requested in good faith so as to give the Parties additional time
27 to investigate the claims in this matter and pursue possible settlement;

1 WHEREBY, the Synchrony Defendants requested and Plaintiff agreed to extend the
2 Synchrony Defendants' time to file and serve a response to Plaintiff's Complaint in Interpleader
3 from April 1, 2020, to May 1, 2020;

4 For the foregoing reasons, the Parties request this Court grant their Joint Motion to extend
5 Synchrony's time to file and serve a response to Plaintiff's Complaint to May 1, 2020.

6
7 DATED: April 1, 2020

LERNER & ROWE

8 By: /s/ Randolph L. Westbrook, III

9 Randolph L. Westbrook (SBN 12893)
10 4795 South Durango Drive
11 Las Vegas, NV 89147
12 *Attorney for Plaintiff*

13
14 DATED: April 1, 2020

15 LEWIS ROCA ROTHBERGER CHRISTIE, LLP

16 By /s/ J Christopher Jorgensen

17 J Christopher Jorgensen (SBN 5382)
18 Matthew Tsai (SBN 14290)
19 3993 Howard Hughes Pkwy, Suite 600
20 Las Vegas, NV 89169-5996
21 *Attorney for Defendants Care Credit LLC*
22 *and Synchrony Financing, Inc.*

23 **ORDER**

24 **IT IS SO ORDERED.**

25 
26 United States Magistrate Judge

27
28 DATED: April 2, 2020